REMARKS

Claims 1-3, 7-10, 12-19, 21, 23-30, 32-34, 37-41, 43-45, 48-52, and 54-57 are now pending in the application, of which claims 1, 24, 37, 48, 50, 51, 52, 54 and 55 are independent. Claims 1, 24, 37, 48, 50, 51, 52, 54 and 55 have been amended herein. Applicants respectfully urge that all of the claims are patentable and in condition for allowance.

Claim Rejections under 35 U.S.C. § 103

In the Advisory Action claims 1-3, 7-10, 12-19, 21, 23-30, 32-34, 37-41, 43-45, 48-52 and 54-57 were rejected under 35 U.S.C. §103(a) as being anticipated by U.S. Patent No. 6,868,526 to Singh (hereafter "Singh") in view of U.S. Patent Application Publication No. 2003/0206654 by Teng (hereafter "Teng").

Applicants respectfully traverse the above rejections.

A. Claim 1

Claim 1 recites:

> 1. A method comprising:
> receiving an input for selecting a first graphical object in an executable block diagram representing a system, the first graphical object having one or more properties;
> displaying a list of one or more transformation operations performable on the first graphical object for transforming the first graphical object into a second graphical object for the executable block diagram;
> receiving an input for selecting one of the one or more transformation operations;
> applying the selected one of the one or more transformation operations on the first graphical object for creating the second graphical object, the second graphical object having one or more properties that are different from the one or more properties of the first graphical object; and
> **incorporating the first graphical object and incorporating the second graphical object into the executable block diagram.**

The Applicants respectfully submit that Singh and Teng taken either, alone or in any reasonable combination, do not disclose or suggest the following feature of claim 1: ***incorporating the first graphical object and incorporating the second graphical object into the executable block diagram***.

In the Advisory Action, the Examiner asserts that on Col. 4, lines 5-15, Singh discloses copying graphical block into the model from the library and updating. The Examiner indicates that he equates this to be Applicants' claimed limitation. However, in the Office Action, the Examiner indicated that Singh does not disclose incorporating the first graphical object and second graphical object into the executable block diagram. *See* Office Action, page 3, lines 18-19. In light of the Examiner's contradicting statements, Applicants amend independent claims to emphasize that in the Present Application, the first graphical object is incorporated into the executable block diagram and ***the second graphical object is incorporated into the executable block diagram***. That is, according to pending claim 1, both of the first graphical object and the second graphical object are incorporated into the executable block diagram. The cited references, taken either alone or in any reasonable combination, do not disclose or suggest this claim feature.

In contrast, in the sections cited by the Examiner, Singh discusses copying graphical subsystem blocks into user models from the libraries. Because there is a link between a source library subsystem block and its instantiation, the module updates the reference copy when the source library subsystem block changes. *See* Col. 4, lines 5-15.

Accordingly, in Singh, the user selects a graphical object from the library, and incorporates a *copy* of the graphical object into the model. The *original* graphical object stays as a part of the library, i.e. is not removed from the library and incorporated into the model. Thus, Singh does not disclose or suggest ***incorporating the first graphical object and incorporating the second graphical object into the executable block diagram***.

Teng does not cure the shortcomings of Singh with respect to disclosing or suggesting incorporating both graphical objects into an executable block diagram. Teng discusses replacing an object in a dynamic image. *See* [0002]. The dynamic image discussed in Teng is digital information recorded using a digital video camera, i.e. a digital video. *See* [0005]. Specifically, Teng discusses replacing the face of the person on a dynamic image with a selected pattern. The first dynamic image is transformed to a second dynamic image having the replaced pattern. The second dynamic image is saved and displayed to the user. *See* Claim 12. As such, in Teng, only the second dynamic image is saved and displayed to the user. Teng and Singh, taken either alone or in any reasonable combination, do not teach or suggest ***incorporating the first***

graphical object and incorporating the second graphical object into the executable block diagram, as provided in Applicants' claim 1.

In addition, as the Examiner did not address the non-analogous art arguments in the Advisory Action, Applicants would like to reiterate that Teng is not an analogous art of morphing and performing object modifications, as asserted by the Examiner.

The present application involves executable block diagrams that represent dynamic systems. Teng's dynamic images are not executable block diagrams. Moreover, neither Teng nor Singh provide any disclosure of how to adapt Teng's technique of replacing an object in a dynamic image for use with executable block diagram.

Applicants respectfully urge that it would not have been obvious to one of skill in the art to combine the teachings of Teng with those of Singh. The teaching of Teng and Singh cannot be combined without further changing their respective functions. Specifically, Singh indicates that the term "graphical block diagram" refers to a set of graphical blocks or nodes and a set of lines (or signals) that carry data between the graphical blocks. Each graphical block typically performs a function and that functions (or equation) is a sub-component of an overall set of equations describing a dynamic system. *See* Col. 3, lines 54-59. Singh further indicates that using the equations defined by the blocks, the graphical block diagrams can be executed in an interpreted environment to produce simulation results as defined by the graphical blocks and signals in a model. *See* Col. 4, lines 1-4. On the other hand, Teng indicates that a dynamic image is a shooting of a scene or location saved using a digital video camera. *See* [0005]. Teng further indicates that dynamic images comprise people tableaus. *See* [0024]. It is not clear how one of skill in the art can apply the teachings of Teng to Singh to modify a dynamic image into an executable (i.e. simulatable) graphical block diagram. Therefore, combining the teachings of Singh and Teng would not yield predictable results as it will be uncertain how the teachings of these references will operate once their respective functions are modified.

For at least the reasons set forth above, the Applicants respectfully urge that Singh and Teng, taken either alone or in any reasonable combination do not disclose or suggest Applicants' claimed ***incorporating the first graphical object and incorporating the second graphical object into the executable block diagram***, which is present in claim 1.

Accordingly, Applicants respectfully request that the Examiner withdraw the above §103 rejection of claim 1.

B. Claims 2, 3, 7-10, 12-19, 21, 23 and 56-57

Claims 2, 3, 7-10, 12-19, 21, 23, and 56-57 depend from claim 1 and, as such, incorporate each and every feature of claim 1. Applicants respectfully urge that claims 2, 3, 7-10, 12-19, 21, 23, and 56-57 are therefore allowable for at least the reasons presented above with respect to claim 1. Therefore, Applicants respectfully request that the Examiner withdraw the above §103 rejection of claims 2, 3, 7-10, 12-19, 21, 23, and 56-57.

C. Claims 24-30, 32-34, 37-41, 43-45, 48-52, 54 and 55

Independent claims 24, 37, 48, 50, 51, 52, 54 and 55 recite features similar to the features set forth in claim 1. Claims 24, 37, 48, 50, 51, 52, 54 and 55 include ***incorporating the first graphical object and incorporating the second graphical object into the executable block diagram***, which, as noted above, Singh and Teng, taken either singly or in any reasonable combination, fail to disclose or suggest.

For at least the reasons set forth above, Applicants respectfully urge that Singh and Teng, taken either alone or in any reasonable combination fail to disclose or suggest each and every feature of claims 24, 37, 48, 50, 51, 52, 54, and 55.

Dependent claims 25-30, 32-34, 38-41, 43-45, and 49 incorporate each and every feature of the independent claims upon which they depend. Thus, Applicants respectfully urge that claims 25-30, 32-34, 38-41, 43-45, and 49 are therefore allowable for at least the reasons presented above with respect to claims 24, 37, 48, 50, 51, 52, 54 and 55.

Therefore, Applicants respectfully request that the Examiner withdraw the above § 103 rejection of claims 24-30, 32-34, 37-41, 43-45, 48-52, 54, and 55.

CONCLUSION

In view of the above comments, Applicants believe the pending application is in condition for allowance and urge the Examiner to pass the claims to allowance. Should the Examiner feel that a teleconference would expedite the prosecution of this application, the Examiner is urged to contact Applicants' attorney at (617) 227-7400.

Please charge any shortage or credit any overpayment of fees to our Deposit Account No. 12-0080, under Order No. MWS-089RCE2. In the event that a petition for an extension of time is required to be submitted herewith, and the requisite petition does not accompany this response, the undersigned hereby petitions under 37 C.F.R. §1.136(a) for an extension of time for as many months as are required to render this submission timely. Any fee due is authorized to be charged to the aforementioned Deposit Account.

Dated: July 6, 2009

Respectfully submitted,

By: /Neslihan I. Doran/
Neslihan I. Doran
Registration No.: L0389
LAHIVE & COCKFIELD, LLP
One Post Office Square
Boston, Massachusetts 02109-2127
(617) 227-7400
(617) 742-4214 (Fax)
Attorney/Agent For Applicants